

# BOND SCHOENECK & KING

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November 24, 2015

Hon. Thérèse Wiley Dancks  
Federal Building and U.S. Courthouse  
P.O. Box 7346  
Syracuse, New York 13261-7346

Re: *Fowler v. Syracuse University*  
Civil Action No.: 5:14-cv-1350 (BKS/TWD)

Dear Judge Dancks:

With respect to Plaintiff's pending motion to compel discovery in the above case, we write to respectfully request that Defendant be permitted to file the following documents under seal as part of its response:

1. Defendant Syracuse University's Response to Plaintiff's First Set of Requests for Admissions;
2. Defendant Syracuse University's Response to Plaintiff's Second Set of Requests for Admissions; and
3. An email exchange between Plaintiff and Defendant's attorneys of record, beginning on November 3, 2015 and ending on November 12, 2015.

Items 1 and 2 have been designated as "Confidential" pursuant to the parties' Confidentiality Stipulation and Protective Order, and item 3 contains discussion of medical information.

If this request is granted, Defendant would plan to file electronically and serve its response on November 30, 2015, and to then hand-deliver hard-copies of the sealed documents to the Court on the following morning of December 1, 2015, if Your Honor is also agreeable to that arrangement.

Thank you for your consideration of this request.

Very truly yours,

BOND, SCHOENECK & KING, PLLC



Andrew D. Bobrek

cc: Elizabeth J. Fowler, Ph.D. (Via Regular Mail and Electronic Mail)  
1062 Lancaster Avenue  
Syracuse, New York 13210

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